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LUBIN & ENOCH, P.C.
Nicholas J. Enoch
State Bar No. 016473
Jarrett J. Haskovec
State Bar No. 023926
349 North Fourth Avenue
Phoenix, Arizona 85003
Telephone: (602) 234-0008
Facsimile: (602) 626-3586
Email: Nick@lubinandenoch.com
Jarrett@lubinandenoch.com

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AZ CORP COMMISSION
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Attorneys for Intervenor IBEW Local 1116

**BEFORE THE ARIZONA
CORPORATION COMMISSION**

IN THE MATTER OF THE
APPLICATION OF TUCSON
ELECTRIC POWER COMPANY FOR
THE ESTABLISHMENT OF JUST
AND REASONABLE RATES AND
CHARGES DESIGNED TO REALIZE
A REASONABLE RATE OF RETURN
ON THE FAIR VALUE OF ITS
OPERATIONS THROUGHOUT THE
STATE OF ARIZONA.

Docket No. E-01933A-12-0291

**NOTICE OF FILING DIRECT
TESTIMONY OF FRANK GRIJALVA**

Pursuant to the Administrative Law Judge's Procedural Order (p. 3) dated September 6, 2012, Local Union 1116, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 1116"), by and through undersigned counsel, hereby provides notice of its filing of the attached Direct Testimony of Frank Grijalva in this docket.

RESPECTFULLY SUBMITTED this 21st day of December, 2012.

LUBIN & ENOCH, P.C.

Arizona Corporation Commission

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Jarrett J. Haskovec

Jarrett J. Haskovec
Attorneys for Intervenor IBEW Local 1116

1 Original and thirteen (13) copies
2 of IBEW Local 1116's Notice of
3 Filing filed this 21st day
4 of December, 2012, with:

5 Arizona Corporation Commission
6 Docket Control Center
7 1200 West Washington Street
8 Phoenix, Arizona 85007-2996

9 Copies of the foregoing
10 transmitted electronically and/or
11 via regular mail this same date to:

12 Janice Alward
13 Chief Counsel, Legal Division
14 Arizona Corporation Commission
15 1200 West Washington
16 Phoenix, Arizona 85007-2927

17 Steven M. Olea, Director
18 Utilities Division
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007-2927

22 Bradley Carroll
23 Tucson Electric Power Company
24 88 East Broadway Boulevard, MS HQE910
25 P.O. Box 711
26 Tucson, Arizona 85702

27 Michael Patten
28 Jason Gellman
Roshka DeWulf & Patten, PLC
One Arizona Center
400 East Van Buren Street, Ste. 800
Phoenix, Arizona 85004
Attorneys for Applicant

Daniel Pozefsky
Chief Counsel
Residential Utility Consumer Office
1110 West Washington Street, Suite 220
Phoenix, Arizona 85007

C. Webb Crockett
Fennemore Craig, P.C.
3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012

Kevin Higgins
215 South State Street, Ste. 200
Salt Lake City, Utah 84111

1 Lawrence Robertson, Jr.
P.O. Box 1448
2 Tubac, Arizona 85646

3 Kurt Boehm
Boehm, Hurtz & Lowry
4 36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

5 John Moore, Jr.
6 7321 North Sixteenth Street
Phoenix, Arizona 85020

7 Stephen Baron
8 570 Colonial Park Drive, Suite 305
Roswell, Georgia 30075

9 Thomas L. Mumaw
10 Pinnacle West Capital Corporation Law Department
P.O. Box 53999
11 MS 8695
Phoenix, Arizona 85072-3999

12 Leland Snook
13 Pinnacle West Capital Corporation
P.O. Box 53999
14 MS 9708
Phoenix, Arizona 85072-3999

15 Court Rich
16 6613 North Scottsdale Road, Suite 200
Scottsdale, Arizona 85250

17 Annie Lappe
18 The Vote Solar Initiative
1120 Pearl Street, Suite 200
19 Boulder, Colorado 80302

20 Cynthia Zwick
1940 East Luke Avenue
21 Phoenix, Arizona 85016

22 Gary Yaquinto
Arizona Utility Investors Association
23 2100 North Central Avenue, Suite 210
Phoenix, Arizona 85004

24 Michael Grant
25 2575 East Camelback Road
Phoenix, Arizona 85016-9225

26 Terrence Spann
27 9275 Gunston Road, Suite 1300
Fort Belvoir, Virginia 22060

28

Travis Ritchie
85 Second Street, 2nd Floor
San Francisco, California 94105

Jeff Schlegel
1167 West Samalayuca Drive
Tucson, Arizona 85704-3224

Timothy Hogan
202 East McDowell Road, Suite 153
Phoenix, Arizona 85004

Michael Neary
111 W. Renee Dr.
Phoenix, Arizona 85027

F:\T\Bry\BREW L 1116 (TEP) NOF #1.wpd

1 **Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A1. Frank Grijalva. My business address is 750 South Tucson Boulevard, Tucson, Arizona
3 85716-5689.
4

5 **Q2. PLEASE DESCRIBE YOUR PRESENT POSITION, BACKGROUND, AND**
6 **EXPERIENCE.**

7 A2. I am the Business Manager/Financial Secretary for Intervenor Local Union 1116,
8 International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 1116").
9 The position of Business Manager/Financial Secretary is an elected union position and,
10 due to the retirement of my predecessor, I was appointed by our Executive Board to my
11 present position in October 2007. I was reelected to my position most recently in June
12 2011. Because all IBEW local unions also have a person holding the position of
13 "President," it is common for persons outside of our organization to believe that the
14 "President" is the principal officer of the Local. That is not the case. Article 17, §§ 4 and
15 8 of the Constitution of the International Brotherhood of Electrical Workers, AFL-CIO,
16 clearly states that the Business Manager/Financial Secretary is the "principal officer" of
17 any IBEW local union.
18

19 Prior to my becoming Business Manager/Financial Secretary for IBEW Local
20 1116, I was employed by the Tucson Electric Power Company ("TEP") for
21 twenty-two (22) years in a variety of bargaining unit positions, including as a
22 Substation Electrician and most recently as a Designer for Transmission and
23 Distribution Construction. While employed at TEP, I was a very active member
24 of IBEW Local 1116, including previously serving as the Local's President and in
25 other positions on the Executive Board.
26

27 **Q3. HAVE YOU TESTIFIED IN OTHER MATTERS BEFORE THE ARIZONA**
28 **CORPORATION COMMISSION?**

1 A3. Yes. On behalf of IBEW Local 1116, I testified in support of the 2008 TEP settlement
2 agreement. *See generally* 2008 Ariz. PUC LEXIS 201. In mid-2009, I testified in
3 support of Trico's then-pending rate application, Docket No. E-01461A-08-0430.
4 Furthermore, I testified in support of UNS Gas' applications for rate relief in two recent
5 rate cases, Docket Nos. G-04204A-08-0105 and G-04204A-11-0158. As my union firmly
6 believes that our success is inextricably linked to the success of our represented
7 companies, we are always willing to voice our public support for them when such support
8 is warranted, as it is in this case.

9
10 **Q4. WHAT IS IBEW LOCAL 1116?**

11 A4. IBEW Local 1116 is the labor organization which serves as the exclusive representative
12 for, *inter alia*, approximately seven-hundred (700) non-managerial employees of TEP
13 who work in many different classifications.

14
15 IBEW Local 1116 and TEP have entered into a long series of collective bargaining
16 agreements ("CBAs") dating back to November 16, 1937 concerning rates of pay, wages,
17 hours of employment, and other terms and conditions of employment. The parties
18 negotiate and enter into two separate CBAs, one covering the Tucson area and one
19 covering the Springerville Generating Station. The current CBAs remain in force
20 between the parties until January 20, 2013, at which point the recently negotiated, signed,
21 and ratified 2013-2016 CBAs covering Tucson and Springerville will be in effect.

22
23 In addition to representing the aforementioned employees at TEP, IBEW Local 1116 also
24 represents hundreds of employees state-wide at UNS Gas [a UNS Energy Corporation
25 ("UNS Energy") company], Southwest Energy Solutions (also a UNS Energy company),
26 Trico Electric Cooperative, Inc., and Asplundh Tree Expert Company.

Q5. PLEASE GIVE SOME EXAMPLES OF THE TEP BARGAINING UNIT POSITIONS FOR WHICH IBEW LOCAL 1116 IS THE EXCLUSIVE BARGAINING REPRESENTATIVE?

A5. Certainly. Among other classifications, IBEW Local 1116 represents all of the TEP employees holding the following positions in Tucson and at Springerville Generating Station:

- Linemen/Cablemen,
- Substation Electricians,
- Fuel Handlers,
- Electronics Technicians,
- Equipment Servicemen,
- Field Technicians,
- Designers,
- Heavy Equipment and Transport Operators,
- Customer Care Representatives,
- Maintenance Electricians,
- Maintenance Mechanics,
- Meter Repairmen,
- Control Room Operators,
- Engineering Technicians,
- Chemical Technicians, and
- Machinists.

Represented TEP employees work in construction, generation, transmission, distribution, and customer service – in other words, in virtually every facet of TEP's utility operations. As one can readily appreciate from even a cursory review of this illustrative list, such represented employees are among those who contribute daily, directly, and substantially to TEP's efforts to provide safe and reliable electric service to its customers.

1 **Q6. AS THE COLLECTIVE BARGAINING REPRESENTATIVE OF TEP**
2 **EMPLOYEES, DOES IBEW LOCAL 1116 PLAY ANY ROLE IN**
3 **CONTRIBUTING TO A SAFE WORKPLACE AT TEP?**

4 A6. Yes. IBEW Local 1116 considers itself to be a partner in safety with TEP. Among other
5 things, representatives of IBEW Local 1116 serve on the parties' Joint Labor
6 Management Safety Committee for both the Tucson and Springerville work sites. As
7 members of the Committee, these representatives of IBEW Local 1116 have a hand in
8 drafting and revising the Safety Manual (applicable to both sites) and the Safety and
9 Accident Prevention Manuals (separate manuals for each site). IBEW Local 1116 also
10 plays a significant role in ensuring that federal, state, and contractual safety standards and
11 measures are observed.

12
13 **Q7. DO YOU BELIEVE TEP IS A RESPONSIBLE CORPORATE CITIZEN?**

14 A7. Absolutely. While by no means perfect, the relationship between IBEW Local 1116 and
15 TEP is one which is mature and stable. When disputes pertaining to the parties' contracts
16 do arise between IBEW Local 1116 and TEP, such disputes are generally resolved
17 through the parties' grievance and arbitration procedures, and such resolutions are final
18 and binding on the parties. It is clear that this stability has benefitted TEP, its employees,
19 and customers. In my opinion, the importance of the strong and stable relationship
20 between a public service corporation and its employees cannot be overstated. I believe
21 that my opinion in this regard is widely shared.

22
23 In addition, TEP has demonstrated a strong commitment to safety and has taken a
24 proactive approach to safety matters. The culture of safety that has consequently
25 developed at TEP enhances TEP's ability to provide safe and reliable electric service by
26 minimizing accidents and injuries and any resulting damage and lost production. This
27 ultimately redounds to the benefit of both employees and rate payers.

1 **Q8. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

2 A8. As you know, Article XV, § 3 of the Arizona Constitution expressly recognizes the
3 employees of public service corporations as central stakeholders whose interests are on
4 par with those of patrons with respect to any potential Commission action. Specifically,
5 the Arizona Constitution provides that “[t]he corporation commission shall have full
6 power to, and shall . . . make and enforce reasonable rules, regulations, and orders for the
7 convenience, comfort, and safety, and the preservation of the health, of the *employees* and
8 patrons of [public service] corporations” (emphasis added).

9
10 On behalf of its own members – the vast majority of whom are both employees and
11 patrons of TEP – IBEW Local 1116 believes this proceeding provides it with a unique
12 and timely opportunity to express to this Commission our support of TEP’s Application.

13
14 **Q9. DO YOU BELIEVE THAT TEP IS ENTITLED TO AN INCREASE ITS RATES**
15 **EFFECTIVE NO LATER THAN AUGUST 1, 2013?**

16 A9. Yes.

17
18 **Q10. DO YOU SUPPORT THE PAYROLL EXPENSE AND PAYROLL TAX EXPENSE**
19 **ADJUSTMENTS SPONSORED BY KAREN G. KISSINGER¹ ON BEHALF OF**
20 **TEP IN THIS MATTER?**

21 A10. Yes, I do. The current CBAs IBEW Local 1116 has with TEP, which were largely
22 negotiated in late 2008 and have been in effect since January 2009, set forth the
23 applicable wage rates for bargaining unit positions from 2009 to 2012. The amount of the
24 wage increases is therefore known and measurable. These rates, I would note, are the
25 product of good-faith negotiation, characterized by give-and-take exchanges, proposals
26 and counter-proposals, between the parties, that is the hallmark of collective bargaining

27
28

¹ Direct Testimony of Karen G. Kissinger, p. 27, ll. 7-22.

1 under the National Labor Relations Act. Because the final wage raise under this contract
2 went into effect on January 9, 2012, it could not be reflected in TEP's expenses during
3 the test year ending on December 31, 2011. Accordingly, an adjustment to each of these
4 expenses is appropriate.
5

6 **Q11. IN HER DIRECT TESTIMONY, KISSINGER ALSO INDICATED THAT**
7 **"CURRENTLY, THE UNION WORKFORCE IS NOT COMFORTABLE WITH**
8 **THE 'AT RISK' COMPONENT OF AN INCENTIVE PROGRAM OR THE**
9 **ABILITY TO REWARD ONE EMPLOYEE MORE THAN ANOTHER, AS TEP'S**
10 **INCENTIVE PROGRAM IS DESIGNED TO DO."**² **INSTEAD, AS SHE NOTES,**
11 **"THE UNION HAS NEGOTIATED PAY SCALES TO INCREASE BASE**
12 **WAGES."**³ **IF THAT IS SO, WHY MIGHT THE UNIONIZED WORKFORCE AT**
13 **TEP PREFER BASE WAGE INCREASES FOR EACH CLASSIFICATION OVER**
14 **ANY SHORT-TERM INCENTIVE COMPENSATION PROGRAM?**

15 **A11.** The preference IBEW Local 1116 has for base wage increases is largely driven by
16 considerations of fairness, equity, and solidarity among those we represent. Also, there
17 are many difficulties attending the adoption and implementation of an incentive program,
18 including selecting relevant, meaningful, and objectively measurable criteria, properly
19 weighting the criteria, and ensuring that the incentives are awarded fairly and without any
20 bias or error. In addition, I believe that negotiating uniform base wage rates benefits
21 TEP. Once base wages are negotiated and agreed upon, TEP instantly knows what its
22 associated labor costs will be for coming years. Such certainty aids TEP in planning and
23 budgeting for the future.
24

25 In a unionized, industrial- or utility-type setting, there are other, somewhat unique, issues
26

27 ² *Id.*, p. 30, ll. 11-13.

28 ³ *Id.*, p. 30, ll. 13-14.

1 presented by the introduction of incentive programs. As the United States Supreme Court
2 explained in a related context some years ago,

3 The practice and philosophy of collective bargaining looks with suspicion
4 on such individual advantages [whereby one employee may be paid more
5 than others or otherwise obtains better terms than other employees]. . . .
6 [A]dvantages to individuals may prove as disruptive of industrial peace as
7 disadvantages. . . . [I]ncreased compensation, if individually deserved, is
8 often earned at the cost of breaking down some other standards thought to
9 be for the welfare of the group, and always creates the suspicion of being
10 paid at the long-range expense of the group as a whole. Such
11 discriminations not infrequently amount to unfair labor practices. The
12 workman is free, if he values his own bargaining position more than that
13 of the group, to vote against representation; but the majority rules, and if it
14 collectivizes the employment bargain, individual advantages or favors will
15 generally in practice go in as a contribution to the collective result.

16 *J.I. Case Co. v. NLRB*, 321 U.S. 332, 338-39 (1944).

17
18 Furthermore, I would note that serious doubts exist as to the efficacy of incentive
19 programs generally, and in particular, whether such programs actually lead to gains in
20 productivity. See, e.g., Alfie Kohn, *Why Incentive Plans Cannot Work*, Harv. Bus. Rev.,
21 Sept.-Oct. 1993 (Vol. 71, Issue 5),⁴ at 54 (“According to numerous studies in laboratories,
22 workplaces, . . . and other settings, rewards typically undermine the very process they are
23 intended to enhance. The findings suggest that the failure of any given incentive program
24 is due less to a glitch in that program than to the inadequacy of the psychological
25 assumptions” underlying such plans). Instead of unqualified gains, a number of
26

27
28 ⁴ This article was adapted from Kohn’s book, *Punished by Rewards: The Trouble with
Gold Stars, Incentive Plans, A’s, Praise, and other Bribes*.

drawbacks have been observed with such plans. Among other problems identified with the utilization of such plans, incentive programs frequently undermine or destroy relationships (among employees or between supervisors and employees), cooperation, and teamwork. *Id.* Particularly in the many inherently dangerous jobs in which our bargaining unit employees work, we are concerned that safety and reliability could very well suffer if the identified problems associated with incentive plans were to materialize.

Q12. WHAT, IF ANY, CHALLENGES DO YOU ANTICIPATE TEP WILL FACE IN THE SHORT- TO MID-TERM REGARDING THE PROVISION OF SAFE AND RELIABLE SERVICE TO ITS CUSTOMERS?

A12. As is the case for so many utilities across the country, *see generally* Application to Intervene on Behalf of Intervenor-Applicants IBEW Locals 387, 640, and 769, Docket No. E-01345A-11-0224, TEP will need to address challenges stemming from the so-called “aging workforce” issue. By that, I mean the difficulties, burdens, and/or concerns associated with having a substantial share of employees in particular positions eligible to retire within the coming decade and the attendant issues relating to the loss of employees with extensive experience, expertise, and institutional knowledge as well as the need to recruit, train, and replace such employees, consistent with the provision of safe and reliable service to TEP customers.

TEP acknowledges that it will need to address this issue in the years to come. Fully forty percent (40%) of its 469 energy service delivery employees will be eligible to retire between 2012 and 2016.⁵ Even more troubling than the sheer magnitude of anticipated retirements is that “[t]he majority of these retirement-eligible employees hold skilled craft positions, making their replacement much more difficult.”⁶

⁵ Direct Testimony of Michael J. DeConcini, at p. 19, ll. 10-16.

⁶ *Id.*

1
2 Allow me to give you one example to illustrate the concern I mention. TEP employs
3 journeyman substation electricians whose duties include performing preventative and
4 corrective maintenance of substation transformers; transformer Load Tap Changers; Gas
5 Oil, Vacuum & Air Circuit Breakers; Circuit Switchers; and Motor Operated Switches,
6 among other things.⁷ Substation journeymen also test substation transformers, perform
7 infrared inspections and oil sampling for lab analysis, and construct new substations with
8 all of this equipment from the ground up.⁸ Finally, these journeymen respond to after-
9 hour callouts whenever equipment malfunctions.⁹

10
11 When substation journeymen who have worked at TEP for a decade or more retire – a set
12 of circumstances TEP will increasingly face in the years to come – they take with them
13 their experience, skill, and knowledge about the TEP system, company culture (including
14 its positive safety culture), operating procedures, and applicable safety rules and
15 standards, among other things. Thirty-one percent (31%) of the employees in this
16 classification are presently retirement eligible, and by the end of 2016, fully fifty percent
17 (50%) of these journeymen will be retirement eligible.¹⁰ However, replacing such key
18 electrical workers by hiring upon their retirement simply will not work. To become a
19 substation journeyman, one must complete a one-year pre-apprenticeship that includes
20 course work and testing, followed by an additional 8,000 hours, or approximately four (4)
21 years, of on-the-job training with not less than 640 hours of related classroom instruction
22
23

24 ⁷ See Exhibit A (TEP's Response to IBEW's First Set of Data Requests, at 1.2 and
25 1.2(a)).

26 ⁸ *Id.*

27 ⁹ *Id.*

28 ¹⁰ See Exhibit A (TEP's Response to IBEW's First Set of Data Requests, at 1.4 and 1.5).

1 and further rounds of testing.¹¹ It generally takes even longer to hone one's skills and
2 develop additional expertise. Accordingly, with anticipated retirement levels rising in the
3 approaching years, TEP faces both a challenge and an opportunity to ensure that it
4 continues to attract and employ fully-qualified personnel consonant with its efforts to
5 provide safe and reliable service to customers.

6
7 **Q13. WHAT, IF ANYTHING, DO YOU BELIEVE TEP CAN DO TO MEET THESE**
8 **CHALLENGES?**

9 A13. To meet these challenges, TEP will need to continue to engage in succession planning
10 within bargaining unit positions (such as the journeyman substation electrician
11 classification). While TEP acknowledges this concern and has begun to take meaningful
12 steps to address it, we believe more needs to be done to avert future shortages of labor in
13 highly-skilled positions and to ensure that TEP is in a position to continue to provide safe
14 and reliable service well into the future.

15
16 IBEW Local 1116 submits that one part of the solution includes TEP hiring, prior to any
17 anticipated wave of retirements in particular positions, a number of employees sufficient
18 to replace the expected number of retiring employees. By hiring new employees prior to
19 such retirements and allowing a period of overlap, more experienced employees would
20 have an opportunity to pass on their knowledge and to assist in training the newly-hired
21 employees, and there would be complete continuity in the staffing of an appropriate
22 number of fully qualified employees. This, in turn, would enhance TEP's ability to
23 ensure that service is provided in a safe and reliable manner.

24
25 It is therefore essential that TEP receive adequate rate relief in these proceedings, since
26 failing to afford TEP a sufficient recovery here would only serve to hinder TEP's efforts
27

28 ¹¹ See Exhibit A (TEP's Response to IBEW's First Set of Data Requests, at 1.6).

1 to provide safe and reliable service to its customers in the future by impairing its ability to
2 maintain appropriate staffing levels, particularly in critical positions.
3

4 **Q14. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 **A14. Yes.**

6 F:\Tiffany\IBEW L 1116 - TEP-028 Testimony#1.wpd
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Exhibit A

**TUCSON ELECTRIC POWER COMPANY'S RESPONSE TO
IBEW'S FIRST SET OF DATA REQUESTS REGARDING THE 2012 TEP RATE CASE
DOCKET NO. E-01933A-12-0291
December 10, 2012**

IBEW 1.2

Describe the Journeymen Substation Electrician position by stating:

- a. The job description and qualifications;
- b. The business unit (e.g., fossil generation, electric service delivery) with which such position is associated for purposes of company organization;
- c. The number of Journeymen Substation Electrician positions at TEP as of (1) the end of the Test Year and (2) the present; and
- d. The nature of the work performed including, inter alia, what role they serve in promoting the convenience, comfort, and safety, and the preservation of the health, of the employees and patrons of TEP.

RESPONSE:

- a. Please see IBEW 1.2(a).pdf, Bates Nos. TEP\030171-030172, for the requested information.
- b. Transmission and Distribution
- c.
 1. Sixteen (16)
 2. Sixteen (16)
- d. The Substation Journeymen are a competent, core workforce who safely perform maintenance on substations in 46, 138, 345 & 500 KV substations. The Journeymen perform preventive and corrective maintenance of substation transformers, transformer Load Tap Changers (LTC), Gas, Oil, Vacuum & Air Circuit Breakers (GCB's, OCB's, VCB's, ACB's), Circuit Switchers, Motor Operated Switches. The Journeymen are also qualified to fully test substation transformers, perform Infrared inspections, and perform oil sampling for lab analysis. In addition, the Journeymen also construct new substations with all of the above equipment from the ground up. The Journeymen respond to after hour callouts when equipment malfunctions.

RESPONDENT:

Carrie Winter

WITNESS:

Michael DeConcini

Tucson Electric Power Company

<i>Position Title:</i>	Journeyman Substation Electrician
<i>Department:</i>	Substations
<i>Business reporting unit</i>	T&D
<i>Reports to:</i>	Substation Construction & Maintenance Group Leader
<i>Level and FLSA status:</i>	Non-supervisory/Non-exempt
<i>EEOC Category:</i>	Craftsman (skilled)
<i>Last updated:</i>	04/27/00

Position Description:

Journeyman who performs all phases of construction, operation and maintenance of substations and substations equipment.

Essential Functions: *(As defined under the Americans with Disabilities Act, these include the following responsibilities, minimum job knowledge, skills, and abilities. This is not necessarily an all-inclusive listing.)*

Position-Related Responsibilities:

- ◆ The ability to interpret electrical drawings, schematics and construction drawings.
- ◆ To perform maintenance and including rebuilding all substation equipment.
- ◆ Troubleshoot all electrical control circuits on substation equipment.
- ◆ To understand and use Test Equipment, such as Transformer Turns Ratio, Doble, Inframatics, Insulation and ground meggar. Breaker analyzers, etc.
- ◆ Civil inspector (able to read all civil construction drawings).
- ◆ Test and inspect substation equipment.
- ◆ Construction and maintenance of all substations and equipment.
- ◆ Perform switching of all electrical equipment, for clearance and hold for orders.
- ◆ Account properly for labor charges.
- ◆ Responding to Company electrical outages.
- ◆ Work on energized equipment at primary voltages not to exceed 15kv (with rubber gloves).
- ◆ Program, repair and test, all breakers OCB, ACB, VCB, & PCB.
- ◆ Supervise and train apprentices assigned to work with him/her
- ◆ Troubleshoot, repair, and test all substation equipment at all remote substations.
- ◆ Assist and correct engineering construction drawing.
- ◆ Employee's qualifications of leadership should enable him/her to assume upgrade to Subforeman or Foreman when required.
- ◆ Perform assigned work in a safe and efficient manner in accordance with Company practices and procedures.

Knowledge, Skills and Abilities:

- ◆ Must have completed Substations apprenticeship program at Tucson Electric Power Company or a comparable apprenticeship or training program.
- ◆ Effectively communicate both orally and in writing.
- ◆ Operate aerial equipment associated with their work.
- ◆ Able to understand and operate lap top computers and calculators
- ◆ Able to operate hot line tools on energized equipment.
- ◆ Able to communicate with major customer.
- ◆ Electrical theory.
- ◆ Demonstrate mechanical aptitude.

All employees are expected and required to adhere to the Company Code of Ethics and Principles of Conduct.

**TUCSON ELECTRIC POWER COMPANY'S RESPONSE TO
IBEW'S FIRST SET OF DATA REQUESTS REGARDING THE 2012 TEP RATE CASE
DOCKET NO. E-01933A-12-0291
December 10, 2012**

IBEW 1.4

Please state the share of employees, both as a percentage (e.g., 40%) and in absolute terms (e.g., 40 out of 100), in each of the job classifications referenced in the preceding data request who: (1) were retirement eligible as of the end of the Test Year; and (2) are presently retirement eligible.

RESPONSE:

1. Eligible to retire as of the end of the Test Year:

Job Classification	Share of Employees	
	Percentage	Absolute Terms
Journeyman Lineman	11%	4 out of 36
Journeyman Substation Electricians	19%	3 out of 16

2. Presently retirement eligible:

Job Classification	Share of Employees	
	Percentage	Absolute Terms
Journeyman Lineman	9%	4 out of 47
Journeyman Substation Electricians	31%	5 out of 16

RESPONDENT:

Gabrielle Camacho

WITNESS:

Michael DeConcini

**TUCSON ELECTRIC POWER COMPANY'S RESPONSE TO
IBEW'S FIRST SET OF DATA REQUESTS REGARDING THE 2012 TEP RATE CASE
DOCKET NO. E-01933A-12-0291
December 10, 2012**

IBEW 1.5

Please state, separately for each of the job classifications referenced in the preceding data request, the share of employees, both as a percentage and in absolute terms, who were, are, or will become retirement eligible at any point between January 1, 2012 and December 31, 2016. (See Direct Testimony of Michael J. DeConcini, at p. 19, 11. 10-16.)

RESPONSE:

Job Classification	Share of Employees	
	Percentage	Absolute Terms
Journeyman Lineman	13%	6 out of 47
Journeyman Substation Electricians	50%	8 out of 16

RESPONDENT:

Gabrielle Camacho

WITNESS:

Michael DeConcini

**TUCSON ELECTRIC POWER COMPANY'S RESPONSE TO
IBEW'S FIRST SET OF DATA REQUESTS REGARDING THE 2012 TEP RATE CASE
DOCKET NO. E-01933A-12-0291
December 10, 2012**

IBEW 1.6

With respect to each of the job classifications discussed in the preceding data request, please state or estimate the average length of time (in years, hours, or both, as may be appropriate) needed for an inexperienced, newly hired employee in each classification to become fully qualified as a journeyman in such classification by way of training, experience, or otherwise.

RESPONSE:

The Journeyman Lineman/Cableman and Journeyman Substations Electrician both require the same training as far as length of time in both years and hours. It is as follows:

Pre-Apprenticeship:

- This classification is a minimum of 1 year in length;
- Must complete a 6 month math course with a score of 85% or better;
- Must complete a 6 month electrical theory course with a score of 85% or better;
- Must pass the 6 month test with an 85% or better;
- Must pass the final exam (at the 1 year mark) with an 85% or better; and
- Must complete all assigned tasks.

Apprenticeship:

- This classification is 4 years in length;
- Must complete 8,000 hours of on-the-job training (field training);
- Must complete 160 hours of related instruction per year (640 hours total) classroom training;
- Must pass knowledge and skills exam every six months with 85% or better;
- Must complete all assigned tasks during each 6-month step of their apprenticeship;
- Must turn in all monthly grade cards on time and accurate; and

At the end of their apprenticeship, completion must be approved by the Joint Apprenticeship Committee ("JAC").

RESPONDENT:

Carrie Winter

WITNESS:

Michael DeConcini